

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

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|--------------------------------|---|--------------------------------|
| SIMPLEAIR, INC., | § | |
| | § | |
| Plaintiff, | § | |
| | § | |
| v. | § | Civil Action No. 2:11-cv-00416 |
| | § | |
| MICROSOFT CORPORATION, et al., | § | JURY TRIAL |
| | § | |
| Defendants. | § | |
| | § | |

UNOPPOSED MOTION TO FILE UNDER SEAL

Defendants Google, Inc. and Motorola Mobility LLC (“Defendants”) hereby request authorization to file under seal Defendants’ Motion to Sever and to Transfer Severed Claims to the United States District Court for the Northern District of California under 28 U.S.C. §1404(a), and all supporting documentation, filed on behalf of Google, Inc., Motorola Mobility, LLC, Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Telecommunications America, LLC, Sony Mobile Communications (USA) Inc., LG Electronics Mobilecomm U.S.A., Inc., HTC Corporation, HTC America, Inc., Futurewei Technologies, Inc. and Huawei Technologies Co., Ltd. Good cause exists to file under seal because Exhibit 1 to the Declaration of Jessica L. Hannah is designated as “Confidential” under the terms of the Protective Order (Dkt. No. 129). Moreover, the Motion to Sever and Transfer discloses “Confidential” information from that Exhibit. For these reasons, Defendants respectfully request that the Court grant their motion to file under seal.

DATED: July 27, 2012

Respectfully submitted,

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*Attorneys for Defendants Google, Inc. and
Motorola Mobility LLC*

CERTIFICATE OF CONFERENCE

Counsel for Google, Inc. and Motorola Mobility LLC have conferred with counsel for Plaintiff regarding this motion and Plaintiff has agreed to the relief sought in this motion

/s/ E. Danielle T. Williams
E. Danielle T. Williams

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on July 27, 2012. Any other counsel of record will be served by First Class U.S. mail on this same date.

/s/ E. Danielle T. Williams
E. Danielle T. Williams

*Attorney for Defendants Google, Inc. and
Motorola Mobility LLC*